



To: Milton Brown
Office of the Chief Counsel
Telecommunications and Information Administration
1401 Constitution Avenue, Room 4713, NW
Washington, DC 20230

Reference: Comments and Notice of Proposed Rules to Implement and Administer a Coupon Program for Digital-to-Analog Converter Boxes

In the matter of who qualifies to receive set-to-boxes:

The program cannot discriminate between television viewers that have only off-air-pickup, and those that have cable and or satellite systems (CSS). Since both of these other systems (CSS) will have converted the signals to analog, the television viewer wishing to watch HD will have to install an outside antenna to obtain their kind of programming. In the future, CSS systems may wish to convert to HD to deliver multiple programs, or HDTV signals, within the same bandwidth. With the FCC blessing, and this could happen, it would require (?) starting up the coupon program all over again. It would be unfair to limit this program only to viewers that have just over-the-air pick up systems. Having the coupons available only to people below a certain income level is a bad idea. The \$19,806 amount suggested is so low that a family of four could not afford the boxes. The boxes should be provided to all who desire them (two to a house hold), unless a family can prove (IRS 1040 form) that their income is below \$19,806, and then the box should be free.¹

Length of time that the coupon can be redeemed:

Three months is too short of time for the viewer to purchase the converter after receiving their coupons. Most viewers will wait until the last minute to get their boxes, and Set-top-boxes supply could be short. By having the coupons with an expiration of July and December (those coupons issued during the first six months of the year will expire in December, and during the second six months, will expire in July of the following year), will provide a pad for supply and demand to meet.

¹ The 1040 form should be provided at the time the coupons are requested, and handled by NTIA, not the seller.

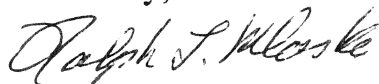
Converter boxes that have features beyond the minimum required to convert a digital signal to analog:

I fail to see why a manufacture cannot put more features into his box if he so desires. He should be able to charge more, and the consumer should still be able to get his \$40 credit. It is the consumer's choice which box he wishes to purchase.

In the matter of Retailer Certification:

It would not be fair to expect the retailer to police the purchasing of converter set-to-boxes. This is a federal responsibility, and cannot be delegated to the seller. It is permissible to require him to furnish the sales information (who, when, and where) to NTIA, but not determine if the consumer is cashing in on invalid coupons, or pocketing money on the return of converters.

Sincerely,

A handwritten signature in cursive script, appearing to read "Ralph L. Mlaska".

Ralph L. Mlaska
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